

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

|  |                              |
|--|------------------------------|
| <b>AAL USA, INC.,</b>                          | )                            |
|  | )                            |
| <b>Plaintiff,</b>                              | )                            |
|  | )                            |
| <b>v.</b>                                      | ) Case No. 2:16-cv-02090-KOB |
|  | )                            |
| <b>BLACK HALL LLC, et al.,</b>                 | )This Document Relates to    |
|  | )Both Cases                  |
| <b>Defendants.</b>                             | )                            |
|  | )                            |
| <hr/>  |                              |
| <b>AAL GROUP, LTD.,</b>                        | )                            |
|  | )                            |
| <b>Plaintiff,</b>                              | )                            |
|  | )                            |
| <b>v.</b>                                      | ) Case No. 2:17-cv-00399-KOB |
|  | )                            |
| <b>BLACK HALL AEROSPACE,<br/>INC., et al.,</b> | )                            |
|  | )                            |
| <b>Defendants.</b>                             | )                            |

**JOINT MOTION FOR DISMISSAL**

AAL USA, Inc. AAL Group, Ltd., Oleg Sirbu, Oleg Fidelskiy,<sup>1</sup> Saul Kirsch, Black Hall Aerospace, Inc., Paul Daigle, David Clarke, Brian Peoples, Black Hall, LLC, Cold Harbor Certifications, Inc., Hindsight Coffee, LLC and Corvis Arrow, LLC (collectively, “the Moving Parties”) hereby jointly stipulate and request that the Court dismiss, with prejudice, all claims and counterclaims asserted or which

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<sup>1</sup> Nothing herein shall constitute a formal appearance on the record on behalf of Oleg Fidelskiy, who was not served with process in this action.

could have been asserted by and between them in these consolidated cases, costs and fees taxes as paid.

In making this request, the Moving Parties hereby jointly stipulate to the dissolution of the temporary restraining order (“TRO”) (dkt. 131) entered prior to this case’s removal from the Circuit Court for Jefferson County, Alabama. The appropriate parties are contemporaneously filing a motion in the Circuit Court for Jefferson County, Alabama to release the bond entered pursuant to the referenced TRO to AAL USA, Inc.

Also, Paul Daigle hereby withdraws his motion for sanctions, filed under seal, as to AAL USA, Inc., Oleg Sirbu, and Rich Freese (ECF 296) (the “Sanctions Motion”) and requests that the Court cancel the hearing on that motion currently set for May 29, 2018.

Further, the Moving Parties hereby jointly stipulate that the documents produced in this case by Maynard, Cooper, & Gale, P.C. (the “MCG Documents”) may be used by the current parties in the pending action styled *AAL USA, Inc., et al., v. Maynard, Cooper & Gale, P.C.*, in the Circuit Court for Jefferson County, Alabama, Civil Action No. 01-cv-2017-905393 (the “MCG Case”) so long as the MCG Documents are made subject to a protective order therein which provides protections equal to or more stringent than the protections provided by the Agreed

Protective Order entered by this Court on January 23, 2017 (ECF 37), as amended by the Court's Protective Order entered February 14, 2017 (ECF 50).

AAL USA, Inc.'s and AAL Group, Ltd.'s claims against defendant Keith Woolford remain pending.

WHEREFORE, premises considered, the Moving Parties request that the Court enter an order: (1) dismissing, with prejudice, all claims and counterclaim asserted or which could have been asserted by and between them in these consolidated cases, costs and fees taxed as paid; (2) dissolving the TRO; (3) mootng the Sanctions Motion; and (4) providing that the MCG Documents may be used by the current parties in the MCG Case so long as the MCG Documents are made subject to a protective order therein which provides protections equal to or more stringent than the protections provided by the Agreed Protective Order entered by this Court on January 23, 2017 (ECF 37), as amended by the Court's Protective Order entered February 14, 2017 (ECF 50).

Dated May 16, 2018

*[Signature]*

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*[Signature]*

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**CERTIFICATE OF SERVICE**

I hereby certify on this 16<sup>th</sup> day of May, 2018, I electronically filed the foregoing with the Clerk of Court using the CMECF system, which will send notification of such filing to the following:

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